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May 31, 2023

VIA ECF

Honorable Tonianne J. Bongiovanni
United States District Court, District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
Room 6052 - 402 E. State Street
Trenton, NJ 08608

**Re: 1985 Rutgers Solar, LLC v. Changzhou Trina Solar Energy Co., Ltd. and
Trina Solar (U.S.), Inc.
United States District Court of District of New Jersey
Case No.: 3:22-cv-06689-RK-TJB**

Dear Judge Bongiovanni:

I represent the plaintiff in the above matter and write in response to the Court's March 14, 2023 Order requiring a status update on this litigation. This matter has not settled but there has been some progress. Defendants provided a framework settlement proposal. Plaintiff, while in the process of evaluating the proposal, has advised defendants of a particular concern with an aspect of the proposal.

While I am hopeful that we will be able to resolve this matter sooner rather than later, I ask that the Court consider entering a discovery order so we can proceed with the litigation while we continue to work through defendant's settlement proposal.

I am available at Your Honor's convenience should you wish to discuss. Thank you for your attention to this matter.

Respectfully,

SHERMAN, SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A.
A Professional Corporation

s/Jeffrey P. Resnick

JEFFREY P. RESNICK

JPR/jr

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